

Exhibit 2

**To the Declaration of Thomas A. Gafford
In Support of Kelora's Opposition to
Defendants' Claim Construction Brief
and Motion for Summary Judgment of
Invalidity and Non-Infringement**

Thomas A. Gafford
July 27, 2011

Pursuant to FRCP 26(a)(2)(B), this is a list of all cases in which I have given testimony at trial (T), hearing (H) or at deposition (D) in the last four years. All are Federal District Courts, date given is date of most recent testimony if known, or date of start of involvement in case. I am the author of no publications within the last 10 years.

date & type of test.	parties	client	case number	subject matter
06/2011 (H)	Greatcall v. Dyna	Greatcall	AAA Arb. 73 494 00433 10	Cell phone terminal and system design
02/2011 (T) 11/2010 (D)	Acqis v. Appro et al.	Acqis	E. Dist of TX, Tyler Div. 6:09-cv-00148-LED	Blade Server system structure and control
01/2011 (T)	Midtronics, Inc. et al. vs Aurora Performance Products LLC, etc., et al.	Midtronics	E. Div., N Dist. of IL 06-C-3917	Control of battery testers
03/2010 (D)	St. Clair v. FujiFilm	St. Clair	DISTRICT OF DELAWARE C.A. No. 08-373-JJF-LPS	Digital camera control and data recording formats
03/2010 (D)	St. Clair v. HTC	St. Clair	DISTRICT OF DELAWARE C.A. No. 06-404-JJF-LPS	Digital camera control and data recording formats
03/2010 (D)	St. Clair v. HTC, Hewlett Packard, Fujifilm, JVC, Panasonic, Kyocera, Nokia, Palm	St. Clair	DISTRICT OF DELAWARE C.A. No. 04-1436-JJS-LPS	Digital camera control and data recording formats
03/2010 (D)	St. Clair v. Kyocera, Palm	St. Clair	DISTRICT OF DELAWARE C.A. No. 06-404-JJF-LPS	Digital camera control and data recording formats
03/2010 (D)	St. Clair v. RIM	St. Clair	DISTRICT OF DELAWARE C.A. No. 08-371-JJF-LPS	Digital camera control and data recording formats
02/2010 (D)	St. Clair v. Hewlett Packard	St. Clair	DISTRICT OF DELAWARE C.A. No. 04-1436-JJS-LPS	Digital camera control and data recording formats
02/2010 (D)	St. Clair v. JVC, Panasonic	St. Clair	DISTRICT OF DELAWARE C.A. No. 04-1436-JJF-LPS	Digital camera control and data recording formats
02/2010 (D)	St. Clair v. Nokia	St. Clair	DISTRICT OF DELAWARE C.A. No. 04-1436-JJF-LPS	Digital camera control and data recording formats
10/2008 (D)	Positive v. LG Displays	Positive	Eastern Dist. Of TX, Marshall Div. 2:07-CV-67-TJW	Control of LCD displays
12/2007 (D)	Kodak v. St. Clair	St. Clair	CA Sup. Ct., County of Santa Clara 1-05-CV-039164	Digital camera control and data recording formats